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Federal Public Defender
2 Nevada State Bar No. 11479
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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 CHRISTOPHER MCDERMOTT,
14 Defendant.

Case No. 2:15-cr-222-RFB

**STIPULATION TO CONTINUE
SENTENCING DATE**
(Second Request)

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16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
17 United States Attorney, and Susan Cushman, Assistant United States Attorney, counsel for the
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel Lazo,
19 Assistant Federal Public Defender, counsel for Christopher McDermott, that the sentencing
20 hearing currently scheduled for January 6, 2016 at the hour of 10:00 a.m., be vacated and
21 continued to a date and time convenient to the Court, but no earlier than thirty (30) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. Additional time is needed to review the presentence investigation with Mr.
24 McDermott ~~Cabrera-Reyes~~. Defense counsel also requires additional time to conduct sentencing mitigation
25 and file a sentencing memorandum.
26 2. The defendant is not incarcerated and does not object to the continuance.

1 3. The parties agree to the continuance.

2 4. The additional time requested herein is not sought for purposes of delay, but
3 merely to allow counsel for defendant sufficient time within which to be able to complete her
4 mitigation for sentencing purposes.

5 This is the second request to continue the sentencing date filed herein.

6 DATED this 11th day of December, 2015

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8 RENE L. VALLADARES
9 Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

10 /s/ *Raquel Lazo*
11 By _____

/s/ *Susan Cushman*
By _____

12 RAQUEL LAZO
13 Assistant Federal Public Defender

SUSAN CUSHMAN
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CHRISTOPHER MCDERMOTT,

7 Defendant.

Case No. 2:15-cr-222-RFB

8 FINDINGS OF FACT, CONCLUSIONS
9 OF LAW AND ORDER

10 FINDINGS OF FACT

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. Additional time is needed to review the presentence investigation with Mr.
14 McDermott ~~Cabrera Reyes~~. Defense counsel also requires additional time to conduct sentencing mitigation
15 and file a sentencing memorandum.

16 2. The defendant is not incarcerated and does not object to the continuance.

17 3. The parties agree to the continuance.

18 4. The additional time requested herein is not sought for purposes of delay, but
19 merely to allow counsel for defendant sufficient time within which to be able to complete her
20 mitigation for sentencing purposes

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

Case No. 2:15-cr-222-RFB

4 Plaintiff,

ORDER

5 v.

6 CHRISTOPHER MCDERMOTT,

7 Defendant.

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10 Based on the pending Stipulation of counsel, and good cause appearing,

11 IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for
12 Wednesday, January 6, 2016 at the hour of 10:00 a.m, be vacated and continued to 2/08/2016 at
13 the hour of 1:30 p.m.

14 DATED this 14th day of December, 2015

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17 RICHARD F. BOULWARE, II
18 UNITED STATES DISTRICT JUDGE
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